

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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WILLIAMS,

Case No. 1:23-cv-02922-NCM-CLP

Plaintiff,

RESPONSE TO SUBPOENA

-against-

THE RUSSO'S PAYROLL GROUP, INC., et al.,

Defendants.

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Non-party Valiant Payroll Services, Inc., ("Valiant Payroll"), the recipient of a subpoena duces tecum, by its attorneys, Forchelli Deegan Terrana LLP, responds to the subpoena dated September 23, 2024, as follows:

DOCUMENT REQUESTS

1. For the above-referenced account, [The Russo's Payroll Group, Inc. d/b/a Russo's on the Bay] ("Russo's") for the above-referenced time period [September 1, 2016 to September 1, 2017], all payroll records.

Response: Valiant Payroll has no responsive documents or electronically stored information.

2. For the above-referenced account, for the above-referenced time period, all attendance records. Russo's had terminated their customer relationship with Valiant prior to the time period specified. Records related to the prior period when the relationship existed would not have been retained pursuant to Valiant's document retention practices as relate to prior customers.

Response: Valiant Payroll has no responsive documents or electronically stored information.

Russo's had terminated their customer relationship with Valiant prior to the time period specified. Records related to the prior period when the relationship existed would not have been retained pursuant to Valiant's document retention practices as relate to prior customers.

Dated: Uniondale, New York
October 10, 2024

FORCHELLI DEEGAN TERRANA LLP

By: 

Russell G. Tisman

Attorneys for Non-Party Witness

Valiant Payroll Services, Inc.

333 Earle Ovington Blvd., Suite 1010

Uniondale, New York 11553

(516) 248-1700

To: Milman Labuda Law Group, PLLC
c/o Colleen O'Neill
300 Marcus Drive, Suite 3WB
Lake Success, NY 11042
Attorneys for Defendants

Stoll, Glickman & Bellina, LLP
300 Cadman Plaza West, 12th Floor
Brooklyn, NY 11201-3211
Attorneys for Plaintiff

Both by ECF